

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2020-125-E

IN RE:)	Dominion Energy South Carolina,
Application of Dominion Energy South)	Inc.'s Second Set of Discovery Requests
Carolina, Incorporated for Adjustment of)	to the Sierra Club
Rates and Charges)	
_____)	

Pursuant to South Carolina Regulation 103-833, Dominion Energy of South Carolina, Inc. ("DESC") respectfully submits its Second Set of Written Discovery Requests for Production of Documents and Things to Sierra Club.

Instructions

1. Responses should be provided within 20 days in writing and under oath, as specified in Regulation 103-833.
2. These requests are continuing in nature and require you to supplement or amend your answer in a timely manner if you learn that the answer is incorrect or incomplete or if you identify additional documents or information responsive to the request.
3. Where knowledge, information, or documents are requested, such request encompasses knowledge, information, or documents in your possession, custody, or control, or in the possession, custody, or control of your staff, agents, employees, representatives, expert witnesses and consultants, and, unless privileged, attorneys.

4. If you object to a portion of any request, state the grounds of your objection with specificity and answer the remainder of the request. Objections on account of vagueness should specifically explain why you believe the request is vague and should state your understanding of the information being sought along with a response consistent with your understanding.

5. For every page produced to DESC that contains confidential information, the page is to be marked "CONFIDENTIAL" in the header. Any specific information which you designate as confidential information must also be marked by notation, highlighting, or other conspicuous means.

6. "Party" is defined as the Sierra Club.

Document and Information Requests

DESC 1-12. Please list all experience Elizabeth Stanton, PhD has related to analyzing electric generation systems and electric generation resource planning.

DESC 1-13. Please list all reports and publications of Elizabeth Stanton, PhD related to electric generation systems and electric generation resource planning.

DESC 1-14. Has Elizabeth Stanton, PhD ever authored an Integrated Resource Plan? If so, provide a copy of the same.

DESC 1-15. Has Elizabeth Stanton, PhD ever prepared a report or analysis or provided testimony analyzing a utility's Integrated Resource Plan? If so, provide a copy of all documents related to each report, analysis or testimony.

DESC 1-16. Please explain, in narrative form, all information, analysis or evidence Elizabeth Stanton, PhD relied upon in concluding that \$27.35 per MWh appropriately reflected the value to DESC's electric system of its generation assets.

DESC 1-17. Do you contend that Cope Station cannot be fully fired with natural gas? If so, please explain why.

DESC 1-18. Do you contend that the greater Charleston area and South Carolina Low Country has sufficient sources of natural gas supply to allow the construction of combined cycle natural gas generation facilities in that area should William Station be retired? If so, please explain why. If not, please provide any generation or transmission resource the Sierra Club proposes in lieu of Williams Station that would allow for sufficient generation to the greater Charleston area and South Carolina Low County and all analysis supporting the same.

DESC 1-19. Have you made any attempt to identify any of the costs incurred by the Company from 2012 to the present to support ash landfill closure plans at its existing coal fired generating facilities? If so, please indicate what was done, the conclusion of your efforts, and provide a copy of all documents related to your analysis of such costs.

[SIGNATURE BLOCK ON NEXT PAGE]

Respectfully submitted,

____s/Belton T. Zeigler

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December 15, 2020
Columbia, South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2020-125-E

IN RE:)	
Application of Dominion Energy South)	
Carolina, Incorporated for Adjustment of)	CERTIFICATE OF SERVICE
Rates and Charges)	

This is to certify that I have this date caused to be served one (1) copy of **Dominion Energy South Carolina Inc.’s Second Discovery Requests to Sierra Club** on behalf of Dominion Energy South Carolina, Inc. in the above-referenced matter upon the persons named below via electronic mail:

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December 15, 2020
Columbia, South Carolina

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____s/Kathryn S. Mansfield_____